

## Exhibit F: Consumer Economic Loss and Medical Monitoring Class Email Notice

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## Email Notice – Consumer Economic Loss and Medical Monitoring Class

Subject: Legal Notice: Individuals who Consumed or Paid for Valsartan or Valsartan-Containing Drugs, a Class Action Lawsuit Could Affect Your Rights

A federal court directed that this Notice be provided to you. The Court authorized and specifically required notice to be provided by email or text message, where available, or U.S. mail in certain limited circumstances.

A class action lawsuit called *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK-SAK (the “Lawsuit”) is currently pending in the United States District Court for the District of New Jersey (“the Court”). The Lawsuit alleges that Defendants (a complete list of these Defendants is available at the Case Website, [www.ValsartanMedicationLawsuit.com](http://www.ValsartanMedicationLawsuit.com)) violated state laws by manufacturing, distributing, selling and/or dispensing Valsartan or VCDs that were contaminated with probable human carcinogens in the form of nitrosamines, N-nitrosodimethylamine (“NDMA”) and N-nitrosodiethylamine (“NDEA”). The Defendants have denied any wrongdoing, have denied that the amounts of NDMA or NDEA in the Valsartan and VCDs at issue were or could be carcinogenic, and have asserted various legal and factual defenses to the claims asserted on behalf of the Classes.

The Court has not decided whether the Defendants did anything wrong or whether the Plaintiffs’ claims have merit. However, the Court has certified both a Consumer Economic Loss Class and a Medical Monitoring Class and various Subclasses of which you may be a member unless you exclude yourself from the Classes and Lawsuit. An individual can participate in one or both of the Classes depending on whether you qualify as a class member based on the class definitions. If you qualify, you have the right to participate as a class member or to opt out. Certain exceptions apply.

The Lawsuit is ongoing. You may visit the Case Website to **register for case updates** regarding the Lawsuit and any potential recovery or benefits by class members. **This will help us contact you in the event of any future settlement or judgment.** This Notice does not include or affect any personal injury claims.

### Who is Included?

The Consumer Economic Loss and Medical Monitoring Classes are generally defined as:

**Consumer Economic Loss Class:** All individuals in the United States and its territories and possessions who, since at least January 1, 2012 through the date of final recall as of November 10, 2021, paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and distributed or sold in the United States by any Defendant.

**Medical Monitoring Classes:** Individuals residing in the United States and its territories and possessions (except Mississippi, New Hampshire, North Carolina, and North Dakota) who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic VCDs manufactured by any Active Pharmaceutical Ingredient or Finished Dose Defendant, and marketed in the United States and its territories and possessions, at least since January 1, 2012.

Detailed information regarding the exact Classes and Subclasses are viewable on the Case Website [www.ValsartanMedicationLaw.com](http://www.ValsartanMedicationLaw.com).

### **What Are My Rights And Options?**

**Do Nothing:** If you do nothing, you will remain a part of the Class(es) and Lawsuit and you will be bound by any future judgment(s) of the Court.

**Opt-Out:** All individuals that satisfy the definitions of either the Consumer Economic Loss Class or the Medical Monitoring Class will be automatically included in the respective Classes unless they chose to opt-out from the Classes and Lawsuit entirely. To opt-out, you must submit an exclusion request to the Class Administrator, **postmarked or emailed and received no later than January 31, 2024**. This is the only option that allows you to pursue your own claims against one or more Defendants for the legal claims made in the Lawsuit. Choosing this option means you will not be bound by any future determination made in the Lawsuit; however, you will also not be eligible for any payments or other benefits, if any, that are awarded to any of the Classes by the Court.

Complete details about how to opt-out from the Classes and Lawsuit are available on the Case Website [www.ValsartanMedicationLawsuit.com](http://www.ValsartanMedicationLawsuit.com).

**Do I have a lawyer in this case?** Yes, if you do not exclude yourself by opting out. The Court has appointed Ruben Honik of Honik LLC, Conlee Whiteley of Kanner & Whiteley, LLC, and John R. Davis of Slack Davis Sanger, LLP to represent the Consumer Economic Loss Class. Rachel Geman of Lieff Cabraser Heimann & Bernstein and Nicholas Migliaccio of Migliaccio & Rathod LLP have been appointed to represent the Medical Monitoring Class.

**Where can I get more information?** This is only a summary of the Lawsuit, your legal rights and options. If you have questions, want to view the detailed notice or other documents, or register to receive updates regarding the Classes and Lawsuit, visit [www.ValsartanMedicationLawsuit.com](http://www.ValsartanMedicationLawsuit.com). You may also call 1-866-875-9644.

**PLEASE DO NOT WRITE OR CALL THE COURT OR THE CLERK'S OFFICE FOR INFORMATION.**

Valsartan Class Administrator

PO Box 3376

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